97-166

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

| | | |
|---|---|---|
| Petition of MCI Telecommunications Corporation and its affiliates, including MCImetro Access Transmission Services, Inc., for arbitration and mediation under the Federal Telecommunications Act of 1996 of unresolved interconnection issues with Southwestern Bell Telephone Company | ) ) ) ) ) ) | Case No. TO-97-67 |

**AFFIDAVIT OF JOANN RUSSELL**

| | | |
|---|---|---|
| STATE OF Texas | ) | |
| | ) | SS. 448-442-5695 |
| COUNTY OF Dallas | ) | |

I, Joann Russell, of lawful age, being duly sworn, depose and state:

1. My name is Joann Russell. I represent MCImetro in its carrier agreement negotiations with various local exchange carriers and interexchange carriers.

2. Attached hereto and made a part hereof for all purposes is my direct testimony.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge, information, and belief.

Joann Russell

Subscribed and sworn to before me, a Notary Public, this 11th day of Sept., 1996.

JO F. ENRIGHT
Notary Public
State Of Texas
My Comm. Exp. May 28, 1997

Notary Public

My Commission Expires:

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Joann Russell and my business address is 2250 Lakeside Blvd., Richardson, Texas 75082.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I represent MCImetro in its carrier agreement negotiations with various local exchange carriers and interexchange carriers.

Q. PLEASE GIVE A BRIEF DESCRIPTION OF YOUR BACKGROUND AND EXPERIENCE.

A. I have worked in the telecommunications industry for thirty (30) years. I have completed numerous training programs within the telecommunications arena. I began my career with MCImetro in March, 1995 as a consultant. Prior to joining MCImetro, I was employed by an ILEC. During my tenure with the ILEC I held various operational positions and an internal auditor position. Some of the major projects that I either directed or implemented included AT&T's divestiture of its Bell Operating Companies, interexchange carrier equal access, ILEC local exchange and access tariff interpretation and billing, Carrier Access Billing System (CABS), and CABS Meet Point Billing. As an internal auditor, I specialized in both operational and financial audits.

Q. IS THE ATTACHED WHITE PAPER YOUR TESTIMONY ON OPERATIONS SUPPORT SYSTEMS AND QUALITY OF SERVICE IMPLEMENTATION

REQUIREMENTS?

A. Yes. The white paper is provided as Exhibit JR-1.

Q. HAVE YOU ALSO ATTACHED A MODEL CONTRACT?

A. Yes, as Exhibit JR-2. This contract language can serve as the basis for the final agreement between MCI and Southwestern Bell, thereby facilitating the task upon completion of this proceeding.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

# EXHIBIT JR-1

## MCI WHITE PAPER ON OPERATIONS SUPPORT SYSTEMS AND QUALITY OF SERVICE IMPLEMENTATION REQUIREMENTS

# OPERATIONS SUPPORT SYSTEMS AND QUALITY OF SERVICE IMPLEMENTATION REQUIREMENTS

by

David Crew
Anne Cullather
Tim deCamp
Scott Ellison
Ron Martinez
Kevin Moss
Bill Moxley
Terri Reaves

August 29, 1996

# OPERATIONS SUPPORT SYSTEMS AND QUALITY OF SERVICE IMPLEMENTATION REQUIREMENTS

## I. INTRODUCTION

The co-authors of this paper prepared for and participated in the on-going interconnection negotiations between MCI and incumbent local exchange carriers (ILECs) throughout the United States. To accomplish this, we had numerous meetings with the many technical and business personnel within MCI responsible for constructing MCI's local network, purchasing ILEC services, and interacting with ILECs' databases and operations support systems. In this process, we found that, in each of these areas, there are a host of different parameters that must be specified for pre-ordering, ordering, provisioning, repair and maintenance, billing, and ongoing service quality. Identification and specification of these parameters are necessary to meet the requirements of the Telecommunications Act of 1996, and of the August 8, 1996 FCC Order implementing the Act, pertaining to interconnection of networks, access to unbundled network elements, resale of retail services, collocation, and access to rights of way.

Based on our discussions, as well as our direct experience, we believe that the identification and specification of these parameters must be based on two key foundations of "parity" that are essential for MCI to be able to offer local exchange telecommunications and exchange access service competitively. These are :

(1) nondiscriminatory access to key databases and operations support systems at "parity "with the ILEC; and

(2) "parity" of service performance.

As we shall discuss in greater detail below, the FCC enunciates an "equal in quality" standard in

its Order. We believe that "parity" in access and "parity" of service performance are the essential elements of the "equal in quality" standard.

It is likely that new systems and enhancements to existing systems will be required to achieve these two aspects of "parity." The FCC Order mandates (at Paragraph 525) that these systems be in place by January 1, 1997. To assist in the practical implementation of the concept of "parity," MCI has identified a number of specific measurable criteria. Given the many details and the range of experts that would be required to testify to each and every specification, we believe that it would be most efficient for the Commission to articulate a set of guiding principles concerning "parity" that MCI and the ILEC can use to reach agreement, with the help of a mediator from the Commission staff, outside of the formal hearings and prior to the conclusion of the arbitration process on these details. The parties would bring back to the Commission only the outstanding issues (if any). We call this process "Mediation Plus."

The primary purpose of this White Paper is to explain the type of systems, databases, and processes to which MCI requires access and the type of measures that should be put in place to ensure "parity."

## II. TO ACHIEVE "PARITY," THE COMMISSION MUST IMPLEMENT AND ENFORCE QUALITY OF SERVICE RULES

In competitive markets, providers compete on such factors as customer service and quality of service in addition to service features and price. Customer service and quality of service include such factors as responsiveness to customer inquiries, the time required to install service, the time to repair service when trouble is reported, and the accuracy of the bill rendered, in addition to the ongoing quality of the service. To the extent that ILEC competitors such as

MCI must rely on the underlying network of the ILEC to provide local and exchange access service -- through interconnection, unbundling, resale, collocation, and ancillary arrangements -- competitors' ability to control customer service or quality of service they offer is limited by the ILEC. Where MCI is providing part of an end-to-end service or process, any improvement in the part that MCI is providing should result in a direct improvement in the service that is available to the customer. To the extent that the ILEC provides MCI with a less than "parity" level of service, any improvement made by MCI would only go to offset the deficiency in quality available from the ILEC. This would inhibit MCI's ability to compete effectively and the opportunity for customers to receive an improved level of service from a new competitor.

To an MCI customer, any reduced quality of service will reflect negatively upon MCI, even if it is due to inferior interconnection, unbundled elements, resold services, interconnection, or ancillary arrangements provided by the ILEC. Absent regulation, the ILEC will have little or no incentive to improve the quality of service for a number of reasons: (1) it may be costly to do so; (2) it may choose to assign its limited resources to meet its own end-user customers' needs first; (3) it has no incentive to help a competitor. If the ILEC were providing these services to MCI in a competitive market where it would lose business if it did not meet certain quality standards, then it might face market incentives to provide service to a competitor, but MCI does not have competitive options to turn to for these inputs. We believe that, given this situation, "parity" is a fair and reasonable requirement to place upon the ILEC and that additional measures are required to redress the imbalance in the ILEC's incentive to provide "parity."

## III. THE FCC REQUIRES "PARITY" OF ACCESS TO SUPPORT SYSTEMS AND DATABASES

The FCC shares MCI's belief that nondiscriminatory access to ILEC databases and systems is necessary. In its discussion of Operations Support Systems in the Order, the FCC found

> that it is absolutely necessary for competitive carriers to have access to operations support systems functions in order to successfully enter the local service market. (Paragraph 521)

Moreover, the FCC concluded that

> operations support systems and the information they contain fall squarely within the definition of "network element" and must be unbundled upon request under section 252(c)(3). (Paragraph 516)

It also concluded that:

> in order to comply fully with section 251(c)(3), an incumbent LEC must provide, upon request, nondiscriminatory access to operations supports systems functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing of unbundled network elements under section 251(c)(3) and resold services under section 251(c)(4). Incumbent LECs that currently do not comply with this requirement of section 251(c)(3) must do so as expeditiously as possible, but in any event no later than January 1, 1997. (Paragraph 525)

The FCC Order also identifies, at paragraph 518, the sort of operations support systems and databases to which access is necessary:

> Without access to review, *inter alia*, available telephone numbers, service interval information, and maintenance histories, competing carriers would operate at a significant disadvantage with respect to the incumbent. Other information, such as the facilities and services assigned to a particular customer, is necessary to a competing carrier's ability to provision and offer competing services to incumbent LEC customers. Finally, ... access to the information such [operations support] systems contain, is vital to creating opportunities for meaningful competition.

To achieve "parity," it is essential that MCI has real-time electronic access and where

appropriate "electronic bonding" systems with the ILEC.

ILECs that provide unique interfaces to their databases and operations support systems do not meet the requirement to provide access of equal quality to operations support systems. If each ILEC is allowed to develop its own unique gateway to these systems, as NYNEX is attempting to do today, the burden for new entrants like MCI will be unnecessarily increased by the requirement to develop separate interfaces and systems for each ILEC. The FCC stated, at paragraph 527:

> Ideally, each incumbent LEC would provide access to support systems through a nationally standardized gateway. Such national standards would eliminate the need for new entrants to develop multiple interface systems, one for each incumbent.

The FCC is confident that this will happen, citing (at paragraph 514) an *ex parte* letter filed in the proceeding in which Bell Atlantic and AT&T state that they expect that, given appropriate guidance from the Commission, the industry can achieve consensus on sufficient data elements and formatting conventions to facilitate that 95% of all inter-telecommunications company transactions may be processed via electronic gateways within twelve months. We are less confident that this will happen unless the states and the FCC implement rules that require the industry to do so rather than allowing individual ILECs to develop their own proprietary gateways.

Full implementation of these standards and interfaces must be achieved in order to ensure that the ILEC has met its unbundling and resale requirements under Section 251(c)(3) and 251(c)(4) of the Act and -- where the ILEC is an RBOC-- before the Section 271 checklist can be met to allow the RBOC to provide long distance service in-region. This need not create a

problem of timing, however, since as the FCC concluded in its Order, access to ILEC operations support systems and databases is technically feasible today (Paragraph 520), and in fact the FCC has ordered the ILECs to comply with its access requirements by January 1, 1997.

## IV. THE FCC REQUIRES "PARITY" OF SERVICE PERFORMANCE

Quality of service may be measured in terms of time scales, such as the time taken to provide a firm order commitment, the time to repair a fault, or the number of rings before a Directory Assistance call is answered. Quality of service also may be measured using a statistical or technical measure such as the proportion of incorrect numbers given by a Directory Assistance Operator, the annual downtime on a circuit, or the percentage billing accuracy of billing data. The measures can be used to identify "parity" by requiring the performance provided by the ILEC to MCI's customers be the same as that provided to its own customers. The FCC Order supports this approach. In the discussion of interconnection at paragraph 224, the Order stated:

> We conclude that the equal in quality standard of section 251(c)(2)(C) requires an incumbent LEC to provide interconnection between its network and that of a requesting carrier at a level of quality that is at least indistinguishable from that which the incumbent provides itself, a subsidiary, an affiliate, or any other party. We agree with MFS that this duty requires incumbent LECs to design interconnection facilities to meet the same technical criteria and service standards, such as probability of blocking in peak hours and transmission standards, that are used within their own networks...[W]e further conclude that the equal in quality obligation imposed by section 251(c)(2) is not limited to the quality perceived by end users. The statutory language contains no such limitation, and creating such a limitation may allow incumbent LECs to discriminate against competitors in a manner imperceptible to end users, but which still provides incumbent LECs with advantages in the marketplace...
>
> Toward this goal, the Commission must specifically reject any ILEC assertions that the

only standards of quality to which they should be held are those standards currently in place via Commission quality rules or state statutes. It must be understood that those standards, some of which may be outdated, were developed to enforce minimum requirements for retail services. The services in question here are either network elements or services provided on a wholesale basis to competitors for their provision of competing retail services. It is for this purpose that the FCC's standard of "parity" is critical. Allowing an ILEC to provide to MCI services at lower levels of quality than the levels it provides to itself (including operational coordination), even if meeting current Commission standards for retail services, will either reduce the quality of MCI's service or force MCI to incur unnecessary costs in order to provide a competitive product, thus hindering competition.

Similarly, in its discussion of resale services, at paragraph 970, the Order stated:

> We conclude that service made available for resale be at least equal in quality to that provided by the incumbent LEC to itself or to any subsidiary, affiliate, or any other party to which the carrier directly provides the service, such as end users. Practices to the contrary violate the 1996 Act's prohibition of discriminatory restrictions, limitations or prohibitions on resale. This requirement includes differences imperceptible to end users because such differences may still provide incumbent LECs with advantages in the marketplace. Additionally, we conclude that the incumbent LEC services are to be provisioned for resale with the same timeliness as they are provisioned to the ILEC's subsidiaries, affiliates, or any other party to which the carrier directly provides the service, such as end users.

## V. TO ENSURE SERVICE PERFORMANCE "PARITY," MEASUREMENT AND AUDIT OF ILEC PERFORMANCE IS NECESSARY

We believe that the mere obligation for ILECs to provide "parity" is in itself insufficient. We therefore propose a twofold check be put in place, consisting of the right of MCI to audit performance and the regular provision of comparative data to MCI by the ILEC. These

requirements will allow MCI to verify complaints we have about service quality and will provide a useful means of keeping the Commission informed of service quality and of how well the ILEC is meeting its "parity" obligation. The specific requirements for the Audits are in Part A, Section 22 of the proposed contract.

## VI. EXAMPLES OF THE APPLICATION OF INTERFACES AND SERVICE PARITY STANDARDS

To provide guidance, we include here some specific examples of the application of the principles of "parity" of access to systems and databases and "parity" of service quality. Full detail of MCI's requirements can be found in Attachment VIII of the contract.

o PRE-ORDERING AND ORDERING processes involve the exchange of information between LECs about current or proposed customer products and services, or unbundled network elements, or some combination of these. Intercompany procedures must be developed to support the ordering of unbundled network elements (such as loops and subloop elements, transport, and switching), interconnection facilities (trunks, etc.), resold wholesale services, and ancillary services such as interim number portability mechanisms (remote call forwarding and direct inward dialing), and customer listing databases that support the white pages directory and directory assistance databases. For example, when MCI uses resale or unbundled elements to provide service to our end users, it is necessary for us to submit orders for such services to the ILEC. If MCI is forced to utilize ordering procedures and interfaces that are inferior to that which the ILEC provides to itself, then we will not be able to provide to our customers an offering equivalent to that provided by the ILEC.

The ordering system used by the ILEC provides electronic access to other ILEC systems

that permit the establishment of the customer account and the service installation. When a customer calls an ILEC customer representative, that customer can immediately be given a telephone number and an installation or service due date. If the ILEC does not provide direct electronic access to such systems, MCI will not be able to provide potential customers with their new telephone numbers (in the case of resale) in "real time" (during the phone call) the way the ILEC can, or to inform customers of the service installation date (in the case of either resale or unbundled elements) in real time fashion, the way the ILEC can.

The importance of access to ILEC operations support systems using electronic interfaces is demonstrated by the case of Rochester Telephone, in which AT&T was not given electronic interfaces with Rochester's ordering systems. Rather, AT&T had to rely on paper faxes to submit orders. Not only did this paper process result in the types of delays and lack of "service parity" noted above, it was also enormously inefficient and could not handle orders in any significant quantity. In the absence of electronic interfaces for order processing, the ILEC will not be providing "service parity" to MCI.

Thus, the directive to provide equal quality service requires that ILEC provide to MCI electronic, real-time interfaces with the ILEC ordering systems for the ordering of trunks, unbundled elements, resale, and other ILEC services to ensure MCI's orders are processed with the same efficiency that the ILEC provides to itself or its affiliates. These electronic interfaces should conform, to the extent practical, to current or expected industry standards. To the extent the ILEC develops a proprietary and different electronic interface system, MCI will be forced to expend additional resources to use the interfaces.

In addition, when MCI wins an ILEC customer who plans to continue to receive primarily the same services, a mechanism is needed to enable MCI to transfer customers from that ILEC quickly and easily. This "transfer-as-is" mechanism would allow MCI to present a wholesale order form to an ILEC instructing the ILEC to transfer a customer to MCI and include all existing services and functionalities to which the customer subscribes. Without a mechanism that allows for quick and accurate transfers for existing customers, efficient shifting between local carriers will be deterred. The FCC recognized the need for such transfers in paragraph 421:

> We agree with CompTel and LDDS that new entrants will be disadvantaged if customer switchover is not rapid and transparent. We also note that the Michigan Commission has recognized the significance of customer switchover intervals and has directed Ameritech and GTE to file proposals on how they will "ensure the equal availability of expeditious processing of local, interLATA, and intraLATA carrier changes." [footnote omitted] Therefore, we require incumbent LECs to switch over customers for local service in the same interval as LECs currently switch end users between interexchange carriers.

o PROVISIONING AND INSTALLATION: Provisioning involves the exchange of information between LECs in which one executes a request for a set of products and services or unbundled network elements (or a combination) from another with attendant acknowledgments and status reports. "Service parity" requires that when MCI initiates an order for an unbundled network element, interconnection trunk, resale service, or other ILEC equipment, facility, or service, our order is processed through the same provisioning and installation systems as orders initiated by the ILEC. Just as ILEC personnel have real time access to the ILEC provisioning system to track the status of installation, an important customer service, MCI requires real time access to those provisioning systems in order to track installation status.

The ILECs have (or should have) target installation intervals for most, if not all, services.

To ensure these same intervals are available to all providers of local service, the Commission should require the ILEC to report regularly the installation intervals for CLECs and itself on each type of installation. Absent such monitoring and reporting, the ILEC could take advantage of the opportunity to provide shorter service installation intervals for its own customers than for CLECs or their customers. Such potential discriminatory treatment can be minimized, if not prevented, by establishing monitoring and reporting requirements.

o MAINTENANCE AND TROUBLE RESOLUTION: Maintenance and repair involves the exchange of information between LECs in which one initiates a request for repair of existing products and services or unbundled network elements (or combinations) from the other with attendant acknowledgments and status reports. As with ordering and provisioning, customers will judge the quality of MCI's service by its response time when trouble is reported. Because many of these troubles will not be problems within MCI's control, but rather within the control of the ILEC, it is critical that the MCI have access to the ILEC's trouble reporting, tracking and resolution systems and that the ILEC meets the same standards for MCI as for its own customers.

MCI is requesting a single point of contact with the ILEC with 24 hour a day, 7 day a week (7/24) coverage. In addition, MCI requires a trouble management and escalation process with repair intervals equivalent to that which the ILEC provides for itself. Failure to have these procedures will inhibit MCI's ability to resolve trouble reports, restore service in a timely manner, and maintain the image of a quality provider in customers' eyes. As with other operations support systems functions, MCI requires real time access to the ILEC's Trouble

Reporting system so that MCI's customer service personnel can provide real time trouble tracking for our customers. In addition, the Commission should establish a reporting requirement to ensure that the ILEC is resolving MCI's and other competitors' maintenance and repair problems within the same time intervals as it resolves its own trouble reports. Failure to have such a reporting requirement provides the opportunity for unequal and discriminatory treatment.

o BILLING issues can be divided into two categories: billing between ILECs and CLECs, and billing of end user customers. For ILEC/CLEC billing, a CABS or CABS-like billing system should be used for charges related to interconnection, unbundled elements, and resale. While CABS may require modifications to be able to bill these elements, it is a system that is familiar to both ILECs and CLECs and has been the foundation for intercompany billing since access charges began. A CABS-like system would be cost-effective because a standardized format would be used for all carriers, rather than a format unique to each LEC. It is important that any system used provide timely and accurate billing detail and be subject to audit reviews.

Timely and accurate billing detail also is needed for billing of end user customers. Customers expect to receive accurate bills on a timely basis reflecting their actual level of service with appropriate rates and charges. For this to happen, it is necessary that the ILECs and CLECs exchange accurate billing information in an efficient, timely manner.

o ONGOING SERVICE QUALITY The quality of items purchased from the ILEC, including interconnection trunks, unbundled elements, resold wholesale services, and other ILEC items, should be of the same quality as the ILEC provides to itself, not merely the standards in

the Commission's rules or state statutes, as discussed above. Anything less would constitute discriminatory treatment and would be a violation of the Act.

## VII. EFFICIENT AND EFFECTIVE RESOLUTION IS BEST ACHIEVED THROUGH THE "MEDIATION PLUS" PROCESS

Given that it is technically feasible for the ILECs to provide access to the operations support systems and databases, and that in some states commission-ordered task forces are working on the development of interfaces and standards, it seems to us that continued negotiation under the guidance of a commission-appointed mediator, separate from the formal hearing process but within the context of the statutorily mandated arbitration process, is most likely to resolve the many detailed issues relating to access to these systems and databases. We recommend that the Commission employ this process, which we call "Mediation Plus," to mediate certain issues at the same time that the formal arbitration proceedings are being conducted. Mediation Plus would be the procedure to resolve detailed operational implementation issues through continued negotiations with the assistance of a Commission representative. Given the very technical or detailed nature of these issues, we believe that resolution of these issues is best handled through a specialized process within this arbitration. These issues should be amenable to this mediation process because the parties have already agreed conceptually to many of the items and the additional direction from the FCC Order and/or industry standards may allow for the resolution of additional items.

The Mediation Plus process should move forward as part of the arbitration request to ensure that all operational implementation issues are resolved in a timely fashion. In the end, all issues must be resolved as part of the arbitration. The Commission should review the progress of

this mediation process two months prior to the arbitration decision date, if time permits. In any event, the progress must be reviewed prior to the end of the arbitration period. To ensure timely resolution, MCI requests that this specialized process begin immediately upon filing of this petition.

"Parity" -- in the FCC context of being at least of equal quality -- can only be measured in terms of detailed technical standards, interfaces, and performance measures (such as installation intervals and maintenance and repair times) that are better addressed in mediated negotiations or industry fora than in contested hearings. Full implementation of these standards, interfaces, and measures must be achieved in order to ensure that the ILEC has met its unbundling and resale requirements under Section 251(c)(3) and 251(c)(4) of the Act and -- where the ILEC is an RBOC -- before the Section 271 checklist can be met to allow the RBOC to provide long distance service in-region. This need not create a problem of timing, however, since as the FCC concluded in its Order, access to ILEC operations support systems and databases is technically feasible today (Paragraph 520), and in fact the FCC has ordered the ILECs to comply with its access requirements by January 1, 1997. Thus, issues involving these detailed standards, interfaces, and measures can be addressed in a process that runs concurrent with, but separate from, a contested arbitration hearing, with the standards, interfaces, and measures explicitly identified before the completion of the arbitration process.

## VIII. ACCESS TO DATABASES

In order to be able to access and commercially use the ILECs' unbundled elements and resale services, MCI needs access to ILEC operations support systems and databases that house

the following kinds of information:

- o Centrex Business Group Information, which contains the Centrex dialing plan and a feature information database. With access to this information, MCI could migrate a Centrex application from the ILEC to itself without disrupting the customer's service.
- o Intercept Information, which contains records relevant to customer disconnect referrals. Access to this information would allow MCI to monitor the accuracy of ILEC disconnect referrals.
- o Operator Reference Information, which contains general information regarding valid area codes, exchanges, and dialing instructions. Access to this information is critical if MCI is to provide a full range of operator services.
- o Customer Record Information System (CRIS), which contains the ILEC's database of customer accounts. Access to this database is required for MCI to verify completion and billing status related to service installations and disconnects, and is particularly important for service parity when MCI resells the incumbent's local services.
- o Emergency Services Information, which associates customer name and address to 911 routing plans.
- o Repair/Dispatch Information, which allows MCI to monitor the status of repairs and dispatches of repair personnel related to use of MCI-purchased unbundled ILEC network functions or resold ILEC services.
- o Service Order Processing systems, which allows MCI to monitor the status of service activation related to our use of unbundled ILEC network functions or resold ILEC

services.

- Switch Network ID data, which describes each ILEC switch, including services supported through each switch, NPA-NXXs served, business and residential line counts, and rate centers served, *etc.* Access to this database is critical to planning efficient local interconnection.
- Local Calling Area data, which describes local calling areas and extended area service calling areas. MCI needs access to this database to construct accurate switch routing tables for our networks when mirroring existing ILEC local calling areas.
- CMDS, which is the industry standard mechanism for the exchange of billable messages such as third-party billed, collect, and calling card messages. Access to this system is necessary for MCI participation in the intercompany arrangements for the clearing of these calls.
- Plant inventory data, which contains information on conduit, fiber, switch port, loop feeder, and loop distribution. Access to this database is necessary to reduce the likelihood that MCI will request infeasible points of interconnection or unbundled network functions. Additionally, access will allow MCI and regulators to ensure that ILEC facilities are made available on a non-discriminatory basis.
- Number Assignment data, access to which would allow MCI, using resold ILEC service or unbundled local switching, to assign numbers to our customers directly, rather than rely on the ILEC to assign phone numbers to MCI customers. As a result, MCI would avoid discriminatory delays to fulfillment of the service order.

# EXHIBIT JR-2

## MCImetro/ILEC INTERCONNECTION AGREEMENT

# MCImetro/ILEC
# INTERCONNECTION AGREEMENT
# 1996

## TABLE OF CONTENTS

**PART A – GENERAL TERMS AND CONDITIONS**